



April 9, 2012

Mr. Erle Townsend
Project Manager
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333

**RE: Canton Mountain Wind Project, Application L-25557-24-A-N/L-25558-TB-B-N
Response to March 18, 2012 Review Memorandum by Department geologist John
Hopeck**

Dear Mr. Townsend,

Canton Mountain Wind, LLC (CMW) is submitting this response to John Hopeck's March 18, 2012 review memorandum regarding the above-referenced application.

Hopeck Comment #1:

Notification provisions under Section 15.4.4 of the construction Spill Prevention, Control, and Countermeasures Plan do not specifically require notification of the Department in the event of a spill. This requirement is found in Section 15.4.5 of the plan, but should be explicit in all sections of the plan discussing notification procedures. Section 15.4.4 also includes requirements for sampling and sample preservation relevant to waters potentially impacted by a spill; the contractor must have suitable equipment onsite for sampling, refrigeration, and preservation of any samples required under this provision.

CMW Response #1:

Section 15 has been revised to address this concern (see Attachment 1).

Hopeck Comment# 2:

The submitted Spill Prevention, Control, and Countermeasures Plan addresses only the construction phase of the project. Prior to operation, but not necessarily prior to construction, the applicant should submit for review and approval a Spill Prevention, Control, and Countermeasures Plan addressing storage and handling of petroleum products and other potential contaminants during operation of the facility.

CMW Response #2:



CMW will submit a complete Spill Prevention, Control, and Countermeasures Plan (SPCCP) to the Department prior to operation of the project.

Hopeck Comment #3:

The well driller's letter in Section 16 of the application references "information published by the Maine Geological Survey" but is not specific about the nature of this information. If the information used is well data collected by the Geological Survey, a copy of the table of the data and a figure showing the location of wells referenced in the data should be submitted.

CMW Response #3:

The data used by Goodwin Well and Water Inc. was the Lewiston quadrangle of Well Depth and Yield Maps published by the Maine Geological Survey (see Attachment 2). The maps indicate that nearby wells (within 1/2 mile) yield 50-100 GPM at 300-400 feet.

Hopeck Comment #4:

Based on the number of turbines proposed and information supplied in Section 18 of the application, the maximum amount of oil potentially stored on site from a single oil change of all eight turbines would be equivalent to approximately eighteen to thirty 55-gallon drums, depending on the turbines used. This is a considerable volume but not outside the possible range of what could be stored in the maintenance building. Any such onsite storage should not be outdoors and should not be for a period exceeding thirty days (unless stored as fuel) or other period recommended by the Bureau of Remediation and Waste Management. If onsite storage is proposed, the applicant should specify the mode of storage; drums or similar storage containers must be kept on spill-control pallets or the equivalent. Methods to be used for onsite storage of waste oil should be specified in the operational Spill Prevention, Control, and Countermeasures Plan required in Item (2).

CMW Response #4:

CMW does not plan to store oil for an oil change on-site for more than thirty days. Onsite storage of any oil (fuel or otherwise) will follow proper containment procedures. These will be addressed in an SPCCP submitted to the department prior to operation.

Hopeck Comment #5:

Soil test pit logs as reported in Section 11 of the application are generally consistent with the soils map and with observations at the site. Locations of test pits 12A and 13A are shown on Sheet 4 of 4 in Section 11, but the logs of these explorations are not included in the material received for review. It is not clear from the information received for review if explorations TP 9A through 11A, and 14A through 75A, were conducted; no logs for any such explorations were received and they are not shown on any of the maps received for review. The applicant should



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Canton Mountain Wind, LLC

clarify this and logs and locations of all explorations recorded at the site should be submitted for review and approval.

CMW Response #5

Logs of test pits 12A and 13A were inadvertently omitted. They are included here as Attachment 3.

Test Pits 9A through 11A and 14A through 75A were excavated, located and logged; however they are not in the project study area of the Canton project, so they were not included in the application materials. Those test pits were submitted for review under application L-25137-24-A-N/L-25137-TG-B-N for the Saddleback Ridge Wind project (Saddleback); they were excavated along the transmission line corridor for that project. Please note that the Saddleback transmission line and Canton project area are overlapping, which may be the cause of the possible confusion in the review.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Andy Novey
Project Manager

cc: Gordon Smith, Verrill Dana, LLP
Kathleen Miller, Tetra Tech EC, Inc.